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 Attorneys for Median Technologies, Inc.,
 Gerard Milhiet and Michael Auffret,
 Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

Mark McGrath, an individual)

Plaintiffs,)

v.)

Median Technologies Inc., et al)

Defendants.)

Case No. C 06 4429 VRW

STIPULATION TO EXTEND
 TIME TO COMPLETE EARLY
 NEUTRAL EVALUATION, EXTEND
 FACT DISCOVERY DEADLINE,
 STAY DISCOVERY UNTIL AFTER
 ENE AND ORDER

IT IS HEREBY STIPULATED by and between Plaintiff Mark McGrath and
 Defendants Median Technologies, Inc., Frederik Brag, Gerard Milhiet and Michael Auffret,
 through their respective counsel, pursuant to Rules 6-1(b) and 6-2 of the Court's local rules,
 to extend the time to complete Early Neutral Evaluation to March 19, 2007.

Stipulation to Extend ENE and Discovery Deadlines

Case No. C-06-4429 VRW

1 IT IS FURTHER STIPULATED that the current fact discovery cut-off date of March
2 30, 2007 be extended to April 30, 2007.

3 The parties agree to this Stipulation because the parties have not been able to conduct
4 sufficient discovery to effectively prepare for the Early Neutral Evaluation. Depositions
5 scheduled prior to the earlier ENE deadline had to be, and were agreed to be, postponed due
6 to, among other things, an error on the part of Plaintiff's counsel regarding the availability of
7 the Plaintiff for deposition. That issue has been resolved and the parties will be able to move
8 forward under these proposed deadlines.

9 If the Court is not inclined to grant this Stipulation, the parties respectfully request a
10 telephonic status conference.

11 IT IS SO STIPULATED

12 Dated: February 20, 2007



14 Hal E. Wright
15 Attorney for Plaintiff

16 Dated: February , 2007

17
18 Michael G. Pedhirney
19 Littler Mendelson
20 A Professional Corporation
Attorneys for Defendants

21 PURSUANT TO STIPULATION, IT IS SO ORDERED

22
23 Dated: _____, 2007

24 _____
25 THE HONORABLE VAUGHN R. WALKER

26
27 Stipulation to Extend ENE and Discovery Deadlines

Case No. C-06-4429 VRW

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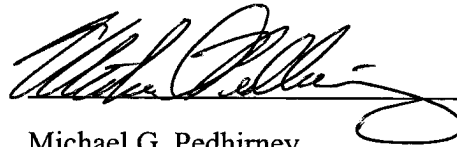
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15 Hal E. Wright
Attorney for Plaintiff

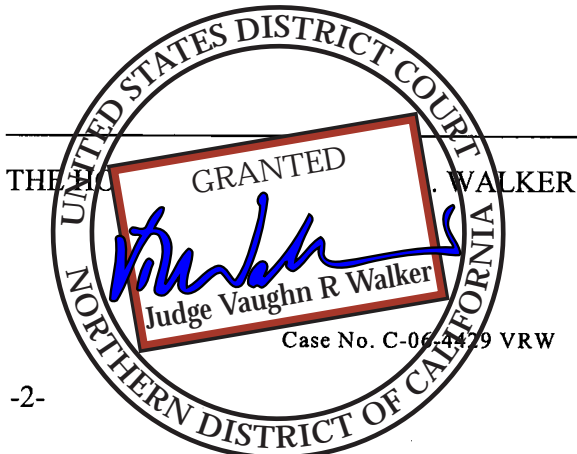
16 Dated: February 20, 2007

17 _____
18 

19 Michael G. Pedhirney
20 Littler Mendelson
A Professional Corporation
Attorneys for Defendants

21 PURSUANT TO STIPULATION, IT IS SO ORDERED

22
23 Dated: Feb. 22, 2007



Stipulation to Extend ENE and Discovery Deadlines